

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
: :
MARTIN & LAURA WEISSFLOG : Case No. 13-15940-ELF
Debtors :
: :

DEBTORS' SECOND MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtors, Martin & Laura Weissflog, by and through Debtors' undersigned attorney, hereby apply to modify Debtors' Chapter 13 Plan on the following grounds:

1. The within Chapter 13 proceeding was commenced by the filing of a bankruptcy petition on July 13, 2013.
2. Debtors' pre-confirmation amended plan requires Debtors to pay to the Trustee \$47,289.00 over sixty (60) months with payments to be made to various Secured Creditors.
3. The aforementioned amended Chapter 13 Plan was Confirmed on or about February 11, 2014.
4. On or about June 23, 2014, secured creditor, LBNJ, LLC filed a Proof of Claim in the amount of \$34,235.26 (Claim #21 on Claims Register).
5. Claim #21 replaces in part and supplements in part Claim #20 filed by Ventnor City Tax Claim Bureau.

6. Claim # 20 has subsequently been Withdrawn.

7. Debtors propose to pay Claim # 21 in full over the remaining forty-eight (48) months of the Plan, thereby increasing the total payout to the Trustee to \$83,149.46 over sixty (60) months.

A true and correct copy of Debtors' proposed Post Confirmation Modified Plan is attached hereto as Exhibit A.

8. The First Modified Plan was approved by the Court on or about August 18, 2014.

9. The Post-Confirmation Modified Plan includes payments to Secured Creditors #2 Specialized Loans and #19 U.S. Bank National) which were first and second lienholders on property located at: 43 Seminary Road, Glenmoore, PA 19363 (the "Glenmoore Property").

10. Secured Creditors #2 and #19 were granted relief from the stay and the Glenmoore Property was sold through foreclosure by the Sheriff of Chester County.

11. Since the Sheriff Sale of the Glenmoore Property, Trustee William Miller, has been making payments on Claims #2 and #19 pursuant to the first Modified Plan.

12. Creditors #2 and #19 have been rejecting and/or returning said payments to Trustee Miller as relief has been entered and their claims have presumably satisfied through the foreclosure process.

13. Trustee Miller currently has over \$11,000.00 in funds on account which Debtors would like distributed to other Secured Creditors in the Post Confirmation Modified Plan (Chester County Tax Bureau, Citadel FCU and LBNJ, LLC).

14. Debtors believe and therefore aver that Debtors will be able to complete Debtors' Chapter 13 bankruptcy proceeding and achieve a discharge should the court approve debtors' new

plan

such as modified and described above.

WHEREFORE, Debtors respectfully request that this Honorable Court approve the debtors' motion to modify their Chapter 13 plan such as describe above.

Dated:

/s/ Gary E. Thompson

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610-431-3300

Attorney for Debtors